

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

**IN RE:**

**ATRIUM MEDICAL CORP. C  
QUR MESH PRODUCTS  
LIABILITY LITIGATION**

**MDL NO. 2753**

**MDL Docket No. 1:16-md-02753-LM**

**Applies to All Cases**

**JOINT MOTION TO EXTEND DEADLINES  
SET FORTH IN CASE MANAGEMENT ORDER 3H**

The parties to the above matter jointly move to extend the deadlines set forth in Case Management Order 3H, and state as follows:

1. As indicated in the parties' Joint Agenda submitted to this Court for the February 13, 2020 status conference (Doc. No. 1181), the parties require additional time to complete the depositions of the physicians, sales representatives, and experts for the Trial Pool plaintiffs.

2. The parties have conferred and agree to extend the following deadlines as follows:

<b>Event</b>	<b>Current Date</b>	<b>New Date</b>
Plaintiffs' expert disclosure of regulatory expert		Per Agreement
Defendants' expert disclosure of regulatory expert		Per Agreement
Rebuttal expert reports due in trial pool cases	November 7, 2019	March 10, 2020
Each side is permitted to strike one case from among the trial pool cases by notifying Lead Counsel for the other side	January 30, 2020	April 14, 2020
Each side is permitted to select one case from among the trial pool cases by notifying Lead Counsel for the other side	January 31, 2020	April 15, 2020
Expert discovery deadline in trial pool cases	December 19, 2019	Per Agreement
Dispositive or Daubert motions due re: trial picks	January 16, 2020	May 13, 2020
Responses to dispositive or Daubert motions due re: trial pick cases	January 30, 2020	May 27, 2020

<b>Event</b>	<b>Current Date</b>	<b>New Date</b>
Replies to dispositive or Daubert motions due re: trial pick cases	February 6, 2020	June 3, 2020
After conferring regarding the first case to be tried, the manner of trial, and the timing of the second case to be tried, the parties shall submit a report to the Court indicating those matters as to which agreement has been reached and setting forth their positions as to all matters where agreement was not reached	February 7, 2020	June 4, 2020
If agreement cannot be reached on 1 <sup>st</sup> case to be tried, the Court will select a case from the 2 cases selected by the parties	February 28, 2020	June 24, 2020
Deadline for Settlement conference for first trial pool case	April 6, 2020	August 3, 2020
First trial	May 20, 2020	Sept. 16, 2020

3. The parties have reached preliminary agreement on dates for the disclosure of regulatory experts and completion of expert deadlines and will work to finalize that agreement. If agreement cannot be reached, the parties will request the Court's assistance, but the need for Court intervention is not anticipated at this time.

4. No memorandum of law is necessary as the relief requested herein is in the discretion of the Court. LR 7.1(a).

WHEREFORE, the parties respectfully request that this Honorable Court grant this Joint Motion to Extend Deadlines as set forth above, and grant such other and further relief as is fair and just.

Date: February 6, 2020

Respectfully submitted,

/s/ Jonathan D. Orent

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 6, 2019, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of Notice of Electronic Filing to all counsel of record.

/s/ Katherine Armstrong  
Katherine Armstrong